

EXHIBIT H

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From: Bill Powers [bpowers@powersengineering.com]
Sent: Thursday, May 24, 2007 2:07 PM
To: 'Steven Donziger'; 'Atossa Soltani'
Cc: 'Simeon Tegel'; 'Kevin Koenig'; 'Jennifer Delury Ciplet'
Subject: RE: exxon valdez 30x

Atossa and Steven,

Atossa, you might want to send Steven my calculations and the references I used.

Bill

From: Steven Donziger [mailto:sdonziger@gmail.com]
Sent: Thursday, May 24, 2007 10:10 AM
To: Atossa Soltani
Cc: Simeon Tegel; Kevin Koenig; Jennifer Delury Ciplet; Bill Powers
Subject: Re: exxon valdez 30x

I think Bill is incorrect. We have checked this with a number of people.

On 5/24/07, **Atossa Soltani** <asoltani@igc.org> wrote:

Hi Steven,

I found the email below from April 2005, where I think is the first time; we the 30 times figure surfaced. It seems like the 2 percent figure (petroleum in formation waters) initially came from, Edison (others fyi, Edison was the tecnico [“technician”] hired by the plaintiffs for the field inspections though he is no longer there). Bill Powers says it is more like an average of .2 percent not 2 percent. So we are off by to factor of 10 it seems. The question is how we save face moving forward and what to do with all the documents where we site this figure on our website.

Atossa

Begin forwarded message:

From: Atossa Soltani <asoltani@igc.org>
Date: April 21, 2005 7:35:59 PM PDT



CERT. MERRILL VER: JD

DONZ-HDD-0112888

To: Steven Donziger <sdonziger@yahoo.com>
Subject: Re: exxon valdez 30x

this says we haven't confirmed????

On Apr 21, 2005, at 2:40 PM, Steven Donziger wrote:

for your viewing pleasure...

edison camino <limcas2002@yahoo.com> wrote:
Date: Thu, 21 Apr 2005 16:36:22 -0500 (CDT)
From: edison camino <limcas2002@yahoo.com>
Subject: Fwd: URGENT CORRECTION
To: Steven DONZIGER <sdonziger@yahoo.com>

Note: forwarded message attached.

Steve:

On 28 of March I sent you, by Internet, the corrected data on Texaco's toxic dumping, during its operation.

The 50 scientists who signed the last letter VOL 11/NO 2, APR/JUN 2005, are writing data that we haven't confirmed. Summary:

TEXACO'S OIL PRODUCTION	1,350 million barrels
TEXACO'S EQUIVALENT OIL PRODUCTION	57,375 million gallons
FORMATION WATER DUMPED IN THE RIVERS	16,600 million gallons
OIL MIXED IN FORMATION WATER	332 million gallons
COMPARISON WITH EXXON VALDEZ	30 times more

Edison

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Date: Mon, 28 Mar 2005 16:24:21 -0600 (CST)

From: edison camino <limcas2002@yahoo.com>

Subject: URGENT CORRECTION

To: Steven DONZIGER <sdonziger@yahoo.com>

Steve:

We are making a mistake. We have used the wrong data to calculate the formation water.

The following data are the correct ones:

FORMATION WATER OF TEXACO

PRODUCTION IN THE TIME OF THE TEXACO

395 million barrels

EQUIVALENT IN GALLONS (42 gallons per barrel)

16,600 million gallons

OIL IN THE FORMATION WATER 332 million gallons

Assuming 2% hydrocarbons dissolved in the formation water, we get:

$16,600 \times 0.02 = 332$ million gallons, that went to the rivers.

If the tanker ship EXXON VALDEZ had a load of 11 million gallons of oil, this means that TEXACO spilled 30 times more in the Amazon, in a direct, efficient, systematic, intentional, efficient manner. They know what they were doing.

Edison

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<mime-attachment>

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Subject: Fwd: URGENTE CORRECCION
To: Steven DONZIGER <sdonziger@yahoo.com>

Note: forwarded message attached.

Steve:

El 28 de marzo te envié por internet los datos corregidos sobre los vertidos tóxicos de Texaco, durante su operación.

Los 50 científicos que firman la última carta VOL 11/NO 2, APR/JUN 2005, están escribiendo datos que nosotros no hemos confirmado. Resumen:

PRODUCCION DE PETRÓLEO DE LA TEXACO	1,350 millones de barriles
EQUIVALENTE PRODUCCION DE PETROLEO DE TEXACO	57,375 millones de galones
AGUA DE FORMACION VERTIDA EN LOS RIOS	16,600 millones de galones
PETROLEO MEZCLADO EN AGUA DE FORMACION	332 millones de galones
COMPARACION CON EXXON VALDEZ	30 veces más

Edison

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5/24/2007

DONZ-HDD-0112889

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Visita Yahoo! Noticias.
Date: Mon, 28 Mar 2005 16:24:21 -0600 (CST)
From: edison camino <limcas2002@yahoo.com>
Subject: URGENTE CORRECCION
To: Steven DONZIGER <sdonziger@yahoo.com>

Steve:

Estamos en un error. Hemos tomado los datos equivocados para calcular el agua de formación. Los siguientes datos son los correctos:

AGUA DE FORMACION DE LA TEXACO	
PRODUCCIÓN EN EL TIEMPO DE LA TEXACO	395 millones de barriles
EQUIVALENTE EN GALONES (42 galones por barril)	16,600 millones de galones

PETROLEO EN EL AGUA DE FORMACION 332 millones de galones

Asumiendo un 2% de hidrocarburos disueltos en las aguas de formación, llegamos a:

$16,600 \times 0.02 = 332$ millones de galones, que fueron a los ríos.

Si el buque tanquero EXXON VALDEZ tenía una carga de 11 millones de galones de petróleo, esto significa que TEXACO derramó 30 veces más en la Amazonía, en forma directa, eficiente, sistemática, intencionada, eficiente, sabían lo que estaban haciendo.

Edison

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5/24/2007

DONZ-HDD-0112890

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5/24/2007

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